



## Privacy Policy SIBS AB (publ)

SIBS AB (hereinafter referred to as "SIBS") values your privacy and your right to control your personal data. The General Data Protection Regulation (GDPR) applies as law in all EU member states from May 25, 2018. Its purpose is, among other things, to protect individuals' fundamental rights and freedoms, especially your right to the protection of personal data.

Within SIBS, there are several subsidiary companies that are committed to handling personal data in a responsible and secure manner. This privacy policy clarifies how SIBS collects and uses your personal data.

### 1 Who is responsible?

SIBS is the data controller and is therefore responsible for processing personal data carried out by us or on our behalf. The subsidiary companies are responsible for collecting and processing personal data in their respective operations. In cases where personal data is shared between the companies, data processing agreements are signed.

### 2 When and for what purposes do we store personal data about you?

When you show interest in any of our offers/business areas and request information about them and/or other offers you wish to take part in.

- When you apply for a job or during recruitment
- When you send an inquiry to us
- When you visit our website or our platforms on social media.
- When you participate in our marketing activities or customer surveys.
- When you communicate with us in any other way, such as through our website/social channels/email.
- When you are employed or have been employed in the past.
- When you are a consultant/collaborator or have been a consultant/collaborator.
- When you are or have been a contractual customer.

### 3 What personal data do we handle about you?

We process the following information that you provide to us when you show interest in any of our offers/business areas or subscribe to our newsletter by notifying us via email or by expressing interest on our website when you purchase or are in the process of purchasing a service from us.

- Your name
- Your address
- Your telephone number
- Your email address
- Your professional role
- The company you work for
- Information about which offer(s)/business area(s) you are interested in

**When you visit our website, we process information about your activity on the website:**

- Your browsing history
- The ID of the device you are using
- Other unique identifiers
- Device and software characteristics (e.g., statistics on the pages you have visited, URL you were referred from, IP address) that may reveal your general location
- Information about the availability and delivery of our ads
- Cookies, which we will provide more information about in our Cookie Policy below.

**When you are an employee/former employee:**

- Your name, address, and personal identification number
- Employment date and position
- Name and telephone number of next of kin
- Salary and bank account information, benefits, various salary transactions, and absences, among other things

SIBS may also need to process sensitive personal data about you, such as information about your health, evaluative information from, for example, employee conversations, etc., in order to fulfill our obligations as an employer.

**När du är anlitad konsult/tidigare anlitad konsult:**

- Your name, address, email, telephone number, and personal identification number/organization number
- Contract date and assignment

#### 4 When do we delete your personal data?

We retain your personal data for as long as necessary to fulfill the purposes stated above. After that, the data is deleted in accordance with our retention policy. This means that some data will be retained longer than others. For example, if you enter into an agreement with us, we retain the agreement and your correspondence with us to fulfill our obligations to you as stated in the agreement.

Cookies expire after a specified period of time, as indicated in our Cookie Information below.

#### 5 On what legal basis do we process your personal data?

We process your personal data when necessary for us to provide the service you have ordered or to fulfill contractual agreements.

- **Contractual Performance:** We process your personal data based on the performance of a contract when we fulfill our obligations to you as a customer, business partner, consultant, etc.
- **Legitimate Interest:** We perform certain processing activities when we have a legitimate interest in using the data. This includes optimizing our sales and marketing activities, using photos and videos, website functionality, market research, and preventing misuse and analyzing statistics.
- **Consent:** Certain processing activities, such as sending marketing materials and information about our services and products to you and conducting market and customer analysis or surveys, require your consent.

## 6 Who do we disclose your personal data to?

SIBS never sells your data to third parties. However, we may disclose your personal data to the following categories of recipients:

- Suppliers, such as IT service providers, insurance providers, telephony providers, customer service handlers, payroll processors, payment intermediaries, and credit agencies on behalf of SIBS.
- Database and software providers to facilitate smooth communication with you.
- Other recipients as required by law, regulations, or official decisions.
- Your bank when you authenticate yourself with Bank ID (e.g., when signing certain types of agreements).

Recipients processing personal data on behalf of SIBS enter into data processing agreements with us to ensure that your data is handled correctly and securely.

When your personal data is shared with an independent data controller, such as an authority or bank, the recipient's privacy policy and information on personal data processing apply.

## 7 Cookies and similar technologies

SIBS uses cookies and similar technologies to provide you with the best possible user experience when you visit some of our digital platforms, such as sibs.se. Cookies are small text files stored on your computer that contain data from websites you have visited. The purpose is to provide visitors with access to various features and facilitate browsing. Learn more about cookies on the website of the Swedish Post and Telecom Authority (Post- och telestyrelsen).

### **There are two types of cookies:**

- A session cookie is temporarily stored in the computer's memory while the visitor is on a website. It disappears when you close the browser.
- A persistent cookie remains on the visitor's computer until it is removed.

### **Use of cookies on sibs.se**

If you decline cookies on sibs.se, it may affect several services and features on the website.

### **Our cookies help us to:**

- Improve the user experience on the website.
- Save your settings from one visit to another.
- Improve your loading time and security when using the website

### **Vi använder INTE cookies till att:**

- Save personal information about you without your consent.
- Collect sensitive information.
- Forward personal information to third parties.

### **Analysis function**

The web analytics tool Google Analytics is used on this website, and cookies collect aggregated information about how visitors use the website. The information includes the number of page views, where visitors come from, and the number of visits in order to improve the website and provide a good user experience. The information is anonymized.

## 8 What rights do you have?

You have the opportunity to influence how SIBS processes your personal data.

### **Right to access your information**

You have the right to obtain information once a year about which personal data is registered with us at SIBS by requesting a register extract from us in writing. This is free of charge.

### **Right to rectification**

You have the right to correct incorrect or incomplete information about yourself. If your personal data changes, please inform SIBS by sending us a message. SIBS is not responsible for any problems that may arise as a result of outdated or incorrect personal data if you have failed to inform us of the change.

Your request should be in writing and personally signed, and include your name, email, telephone number, and postal address. We require this information to ensure that we provide the data to the correct person. The request as described above should be sent to SIBS. The information will be sent to your registered address.

### **Right to be forgotten**

You have the right to request that we delete your personal data if you wish. However, there may be legal obligations that prevent us from immediately deleting your personal data. These obligations may arise, for example, from accounting laws and our contractual obligations. In such cases, we will block your personal data so that it is only used to fulfill these legal obligations.

### **Right to request restriction of processing**

In certain cases, you have the right to request the restriction of processing of your personal data. Restriction means that the data is marked so that it can only be processed for specific purposes in the future. For example, you can choose not to receive newsletters at any time.

### **Right to object to the processing of your data**

In certain cases, you have the right to object to the processing of your personal data. Exceptions apply when other legislation forms the basis for the processing.

### **Right to lodge a complaint with the Swedish Authority for Privacy Protection (Integritetsskyddsmyndigheten - IMY)**

If you believe that SIBS is processing your personal data in violation of the GDPR, you can file a complaint with IMY.

### **Right to data portability**

If you have provided your personal data, you have the right in certain cases to receive and use your personal data elsewhere. SIBS is obligated to facilitate such transfer of personal data.

## 9 Amendment of this privacy policy

SIBS may make changes to this privacy policy from time to time. The latest version of the privacy policy is always available on the SIBS website.

**Please feel free to contact us if you have any questions**

You are always welcome to contact us for assistance in opting out of our communication.

[info@sibs.se](mailto:info@sibs.se)

If you have any questions regarding your personal data, please contact us by submitting a written, personally signed request, along with a certified photo of a valid identification document, to:

SIBS AB  
Grev Turegatan 19  
114 38 Stockholm

In the letter, please provide your name, address, email, telephone number, and personal identification number in addition to your inquiry. Also, attach a certified copy of your identification document. You will receive a response within one month by personally visiting our headquarters at Grev Turegatan 19 in Stockholm and verifying your identity.

## 10 Update and board approval

The privacy policy should be reviewed annually or more frequently as needed.

This policy was adopted by the board of directors of SIBS AB on June 28, 2023